

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Counsel for J.M. Ahle Co., Inc.

In re:

ASSUNCAO BROS., INC.,

Debtor.

Chapter 11(Subchapter V)

Case No.: 22-16159-CMG

Judge Christine M. Gravelle

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE PURSUANT TO FED. R. BANKR. P. 2002**

PLEASE TAKE NOTICE that the undersigned appears as counsel for **J.M. Ahle Co., Inc.** (the “Notice Party”), and, pursuant to Federal Rules of Bankruptcy Procedure 2002, 9007 and 9010 and sections 102(1), 342 and 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), requests that all notices given or required to be given in this case or any related adversary proceeding, be given to and served upon the undersigned at the address set forth below:

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PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance, nor any former or later pleading, claim or suit shall waive or be deemed or construed to waive any right of the Notice Party, including without limitation its right (i) to have final orders in non-core matters entered only after de novo review by a higher court, (ii) to trial by jury in any proceeding or matter in this case, or any case, controversy or proceeding related to this case, whether or not the same be designated legal or private rights, notwithstanding the designation of such matters as “core proceedings” pursuant to 28 U.S.C. § 157(b)(2), (iii) to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, and/or (iv) any other rights, claims, actions, defenses, set-offs, or recoupments to which the Notice Party is or may be entitled under agreements, in law or in equity or under the United States Constitution, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved and preserved unto the Notice Party without exception, and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Dated: August 5, 2022

EARP COHN, P.C.

By: /s/Richard M. Schlaifer
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